

FILED
COURT OF APPEALS
DIVISION II

NO. 46154-4-11

IN THE COURT OF APPEALS
FOR THE STATE OF WASHINGTON
DIVISION II

2014 OCT 16 PM 1:34

STATE OF WASHINGTON

BY

DEPUTY

STATE OF WASHINGTON
WILLIAM HOLDNER, RANDAL HOLDNER
AND HOLDNER FARMS WASHINGTON

APPELLANTS'

v.

PORT OF VANCOUVER, USA, A
WASHINGTON MUNICIPAL CORPORATION

RESPONDENT

ON APPEAL FROM THE SUPERIOR
COURT OF CLARK COUNTY

BEFORE

THE HONORABLE BARBARA D. JOHNSON, JUDGE

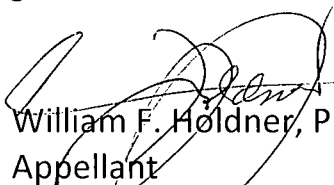
REPLY TO RESPONDENT'S BRIEF

William F. Holdner
975 SE Sandy Blvd.,
Portland, OR 97214
Tel: 503-233-4601
Fax: 503-233-5128
E-Mail: jane@holdnerbaum.com

The Port gave appellants' a 45 day notice of eviction on November 10, 2006. The destruction of the mobile home and damage to silage by the Port of the appellants' personal property was all done prior to the 45 days allowed by the Port. This action by the Port doesn't exemplify a duty of good faith and honorable fair dealing.


Appellants' respectfully requests that this Court based on the disputable facts and unfair dealing reverse the Summary Judgment and remand back to Clark County Superior Court for further proceedings.

Dated October 14, 2014.



William F. Holdner, Pro Se
Appellant

Randal W. Holdner, Pro Se
Appellant



CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2014, I served the foregoing Reply to Respondent's Brief on the following individuals by mailing to said individuals a true copy thereof, addressed to their known address and deposited in the post office at Portland, Oregon.

Kelly M. Walsh, WSBA # 35718
Schwabe Williamson & Wyatt
700 Washington Street, Suite 701
Vancouver, WA 98660

Averil Rothrock, WSBA # 24248
Schwabe Williamson & Wyatt
1420 Fifth Ave., Suite 3400
Seattle, WA 98101

Phillip J. Haberthur
Schwabe Williamson & Wyatt
700 Washington Street, Suite 701
Vancouver, WA 98660



William F. Holdner, Pro Se
Appellant

Dated October 14, 2014